

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JUSTIN DOUANGMALA (01)

No. 4:23-CR-252-O

FACTUAL RÉSUMÈ

I. Plea:

The defendant is pleading guilty to Count One: Conspiracy to Traffick in Firearms, in violation of 18 U.S.C. § 933(a)(3).

II. Penalties:

The penalties the Court can impose include:

- a. imprisonment for a period not to exceed fifteen (15) years;
- b. a fine not to exceed \$250,000;
- c. a term of supervised release not to exceed three (3) years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of supervised release, the Court may revoke such release term and require that the defendant serve an additional period of confinement;
- d. a mandatory special assessment of \$100;
- e. restitution to victims or to the community; and
- f. forfeiture of firearms and ammunition.

III. Elements of the Offense:

The elements the government must prove beyond a reasonable doubt to establish the offense alleged in Count One are:

First: That the defendant knowingly agreed or conspired with at least one other person to ship, transport, transfer, or cause to be transported, or otherwise dispose of any firearm to another person in or otherwise affecting interstate or foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony;

Second: That the defendant knew of the unlawful purpose of the agreement and joined in it willfully, that is, with intent to further its unlawful purpose.

IV. Stipulated Facts:

In April and May of 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Justin Douangmala** agreed and conspired with others to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearm to another person in or otherwise affecting interstate or foreign commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of a firearm by the recipient would constitute a felony.

During that time period, **Douangmala** agreed with other individuals to send one or more firearms from Texas to California, having reasonable cause to believe that it was a felony for that other individual in California to possess or receive the firearm. **Douangmala** knew of the unlawful purposes of the agreement and joined in it willfully.

AGREED AND STIPULATED on this 22nd day of August, ^{BP} 2023.



JUSTIN DOUANGMALA
Defendant



BRIAN D. POE
Counsel for Defendant